| FILED PATRICK D. ROBBINS (CABN 152288) Acting United States Attorney PAMELA T. JOHANN (CABN 145558) Chief, Civil Division AUDREY PAK (CABN 299991) Assistant United States Autorney 450 Golden Gate Avenue, 9th Floor San Francisco, CA 94102-3495 Telephone; 4(15) 436-64838 FAX; (415) 436-6483 FAX; (415) 436-6483 Audrey, Pak@usdoj.gov Attorneys for the United States of America UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, V. HUMANGOOD NORCAL CORP, et al,. Defendants. FILED UNDER SEAL On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States of Act, 31 U.S.C. § 3730(b)(1), the United State | | Case 3:24-cv-06344-AGT Documer | nt 16 Filed 03/28/25 Page 1 of 3 | |
|--|----|---|---|--|
| 2 Chief, Civil Division 3 AUDREY PAK (CABN 145558) Chief, Civil Division AUDREY PAK (CABN 299991) Assistant United States Attorney 450 Golden Gate Avenue, 9th Floor San Francisco, CA 94102-3495 Telephone; (415) 436-6748 Audrey, Pak@usdoj.gov Attorneys for the United States of America UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO UNITED STATES OF AMERICA ex rel. 17 TAXPAYERS AGAINST FRAUD LLC, Plaintiff, V. HUMANGOOD NORCAL CORP, et al., Defendants. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action withou prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | | | |
| CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO Authority PAK (CABN 299991) Assistant United States Attorney 450 Golden Gate Avenue, 9th Floor San Francisco, CA 94102-3495 Telephone: (415) 436-6838 FAN: (415) 436-6748 Autory-Pak@usdoi.gov Attorneys for the United States of America UNITED STATES DISTRICT COURT NORTHERN DISTRICT COURT NORTHERN DISTRICT COURT NORTHERN DISTRICT COURT NORTHERN DISTRICT COURT OUT OF CALIFORNIA SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, NOTICE OF CONSENT TO DISMISSAL; PROPOSEDJ ORDER PILED UNDER SEAL FILED UNDER SEAL On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL: [PROPOSED] ORDER | | Acting United States Attorney | | |
| ASSISTANT United States Attorney 450 Golden Gate Avenue, 9th Floor San Francisco, CA 94102-3495 Telephone; 415) 436-6348 Audrey-Pak@usdoj.gov Attorneys for the United States of America UNITED STATES OF AMERICA ex rel. 11 TAXPAYERS AGAINST FRAUD LLC, 12 Plaintiff, 13 Plaintiff, 14 Plaintiff, 15 V. HUMANGOOD NORCAL CORP, et al., 16 Defendants. 17 Defendants. 18 On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | Chief, Civil Division | | |
| 450 Golden Gate Avenue, 9th Floor San Francisco, CA 94102-3495 Telephone: (415) 436-6748 Audrey-Pak@usdoj.gov Attorneys for the United States of America UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, NOTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, NOTICE OF CONSENT TO DISMISSAL; PROPOSEDJ ORDER HUMANGOOD NORCAL CORP, et al., Defendants. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 3 | | | |
| San Francisco, CA, 94102-3495 Telephone: (415) 436-6838 FAX: (415) 436-6748 Audrey, Pak@usdoj.gov Attorneys for the United States of America UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, NOTICE OF CONSENT TO DISMISSAL; IPROPOSED ORDER HUMANGOOD NORCAL CORP, et al., Defendants. PILED UNDER SEAL On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 4 | | SAN FRANCISCO | |
| Attorneys for the United States of America UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, V. HUMANGOOD NORCAL CORP, et al,. Defendants. PILED UNDER SEAL. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action withou prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 5 | San Francisco, CA 94102-3495 | | |
| Attorneys for the United States of America UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, Plaintiff, V. HUMANGOOD NORCAL CORP, et al, Defendants. Perfect of Consent to Dismissal. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 6 | FAX: (415) 436-6748 | | |
| UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, V. HUMANGOOD NORCAL CORP, et al., Defendants. Plaintiff, Defendants. TILED UNDER SEAL FILED UNDER SEAL On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 7 | Audrey.Pak@usdoj.gov | | |
| 9 NORTHERN DISTRICT COURT 10 SAN FRANCISCO DIVISION 11 UNITED STATES OF AMERICA ex rel. 13 TAXPAYERS AGAINST FRAUD LLC, 14 Plaintiff, 15 V. 16 HUMANGOOD NORCAL CORP, et al 17 Defendants. 18 Defendants. 19 Defendants. 19 Defendants. 10 Defendants. 11 Defendants. 12 On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 24 Civil Action No. 24-cv-6344-AGT THE UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | Attorneys for the United States of America | | |
| NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 11 12 13 14 15 16 17 18 19 19 20 21 22 23 24 25 26 On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | UNITED STATE | ES DISTRICT COURT | |
| SAN FRANCISCO DIVISION UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, NOTICE OF CONSENT TO DISMISSAL; PROPOSED ORDER HUMANGOOD NORCAL CORP, et al,. Defendants. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | NORTHERN DIST | TRICT OF CALIFORNIA | |
| 12 UNITED STATES OF AMERICA ex rel. 13 TAXPAYERS AGAINST FRAUD LLC, 14 Plaintiff, 15 v. 16 HUMANGOOD NORCAL CORP, et al., 17 Defendants. 18 | | SAN FRAN | CISCO DIVISION | |
| UNITED STATES OF AMERICA ex rel. TAXPAYERS AGAINST FRAUD LLC, Plaintiff, V. HUMANGOOD NORCAL CORP, et al,. Defendants. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | | | |
| THE UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; Plaintiff, v. HUMANGOOD NORCAL CORP, et al,. Defendants. PILED UNDER SEAL FILED UNDER SEAL On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | | Civil Action No. 24-cv-6344-AGT | |
| 15 v. HUMANGOOD NORCAL CORP, et al,. Defendants. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | |) | | |
| HUMANGOOD NORCAL CORP, et al,. Defendants. PILED UNDER SEAL On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 14 | Plaintiff, | | |
| Defendants. Defendants. D | 15 | v.) | | |
| Defendants. Defendants. Defendants. On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 16 | HUMANGOOD NORCAL CORP, et al,. |) FILED UNDER SEAL | |
| On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 17 | Defendants. |)) | |
| On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 18 |) | | |
| On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 19 | | | |
| On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 20 | | | |
| On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 21 | | | |
| On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 22 | , |) | |
| without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 23 | | | |
| States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 24 | On March 25, 2025, Relator Taxpayers Against Fraud LLC filed a notice of voluntary dismissal | | |
| States hereby notifies the Court that the Attorney General consents to the dismissal of this action without prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | 25 | without prejudice of this action. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United | | |
| prejudice to the rights of the United States, based on its determination that such a dismissal is UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | States hereby notifies the Court that the Attorney General consents to the dismissal of this action without | | |
| 28 UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | prejudice to the rights of the United States, based | on its determination that such a dismissal is | |
| UNITED STATES OF AMERICA'S NOTICE OF CONSENT TO DISMISSAL; [PROPOSED] ORDER | | | | |
| | 20 | | ENT TO DISMISSAL; [PROPOSED] ORDER | |

commensurate with the public interest and that the matter does not warrant the continued expenditure of government resources to pursue or monitor the action based on currently available information.

Relator's notice of voluntary dismissal contains a request that all papers and filings in this matter remain under seal. The United States objects to Relator's request to keep this case under seal, on the ground that the False Claims Act qui tam seal is only for the period of time that the government needs to investigate a relator's allegations and make a determination whether to intervene in the case. See 31 U.S.C. § 3730(b)(2)-(4). The United States therefore requests that all papers on file in this action, including Relator's Complaint, the Summons (if any), the Case Management Order, Relator's Notice of Dismissal, this Notice, and the attached Proposed Order, be unsealed, and that the seal be lifted as to all matters subsequently occurring in this action.

A proposed order accompanies this notice.

DATED: March 27, 2025 Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

AUDREY PAK

/s/ Audrey Pak

Assistant United States Attorney

| 1 | UNITED STATES DISTRICT COURT | |
|--------|---|--|
| 2 | NORTHERN DISTRICT OF CALIFORNIA | |
| 3 | SAN FRANCISCO DIVISION | |
| 4 5 | UNITED STATES OF AMERICA <i>ex rel.</i> TAXPAYERS AGAINST FRAUD LLC,) Civil Action No. 24-cv-6344-AGT | |
| 6 | Plaintiff,) | |
| 7 | v.) <u>FILED UNDER SEAL</u> | |
| 8 | HUMANGOOD NORCAL CORP, et al,. | |
| 9 | Defendants. | |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | [PROPOSED] ORDER | |
| 16 | The Relator, Taxpayers Against Fraud LLC, having filed a Notice of Voluntary Dismissal of this | |
| 17 | action without prejudice, and the United States having filed its Notice of Consent to Dismissal, pursuant | |
| 18 | to the False Claims Act, 31 U.S.C. § 3730(b)(1), IT IS HEREBY ORDERED THAT: | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | 3. the seal be lifted as to all other matters occurring in this action after the date of this order. | |
| 23 | | |
| 24 | This day of, 2025. | |
| 25 | | |
| 26 | HON. ALEX G. TSE | |
| 27 | United States Magistrate Judge | |
| 28 l | | |